

WILLKIE FARR & GALLAGHER_{LLP}

1875 K Street, N.W.
Washington, DC 20006-1238

Tel: 202 303 1000
Fax: 202 303 2000

June 11, 2025

VIA ECF

The Honorable Lewis J. Liman
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049 (LJL)

Dear Judge Liman:

Plaintiff Blake Lively respectfully submits this letter in response to the Court's Order of June 9, 2025, directing her to "inform the Court . . . whether issues regarding the Wayfarer Third Parties' compliance with subpoenas, Dkt. No. 200, remain pending for the Court's decision." Dkt. No. 299.

The issues raised in Ms. Lively's motion to compel remain outstanding. Ms. Lively served subpoenas on the Wayfarer Third Parties in early March, and agreed to extend the original compliance dates for each of the Wayfarer Third Parties into mid-April. *See* Dkt. No. 200, at 1. As of this writing, seven weeks after the latest of those extended compliance deadlines, none of the Wayfarer Third Parties—all of whom are represented by counsel for Wayfarer Studios LLC—has produced a single document from his or her individual possession, custody, or control.

Yesterday, counsel for the Wayfarer Third Parties represented to counsel for Ms. Lively that any "responsive materials exclusively within the possession, custody, or control of the individual Wayfarer Third Parties will be produced separately in short order and no later than July 1, 2025," which is the deadline for substantial completion of document production in this action. *See* Dkt. No. 58, ¶ 6. But the Wayfarer Third Parties already agreed to extended subpoena compliance dates months ago, yet have continued to delay at every step—given how they have treated these prior agreed-upon deadlines, Ms. Lively has no assurance that they will adhere to their latest extension, and discovery is set to close in just over two months. Of course, the "substantial completion" deadline does not relieve the Wayfarer Third Parties of their obligation to comply with subpoena deadlines that—even with the extensions Ms. Lively granted them—are now seven weeks in the past, and which the Wayfarer Third Parties have brazenly ignored. The fact that they have retained the same counsel as Wayfarer does not give the Wayfarer Third Parties license to ignore subpoena deadlines or coordinate production with Wayfarer on a schedule of their choosing.

Ms. Lively respectfully requests that the Court proceed to adjudicate the motion to compel.

Respectfully submitted,

s/ Michael J. Gottlieb